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**PROPOSED COUNSEL TO DEBTORS  
AND DEBTORS IN POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:	§	
Stoli Group (USA), LLC, <i>et al.</i> , <sup>1</sup>	§	Chapter 11
Debtors.	§	
	§	Case No.: 24-80146-swe11
	§	
	§	(Joint Administration Requested)
	§	

**AMENDED AGENDA FOR MATTERS SCHEDULED FOR  
FIRST-DAY HEARING TO BE HELD ON DECEMBER 3, 2024, AT 9:30 A.M.**

Stoli Group (USA), LLC (“Stoli USA”) and Kentucky Owl, LLC (“KO”), as debtors and debtors in possession (collectively, the “Debtors”), hereby file their amended agenda for hearings on **Tuesday, December 3, 2024, at 9:30 A.M. Central Time**, before the Honorable Scott W. Everett, U.S. Bankruptcy Judge for the Northern District of Texas (the “Hearing”). The Debtors will ask the Court to consider the following:

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal identification number, are Stoli Group (USA), LLC (5602) and Kentucky Owl, LLC (3826). The Debtors’ address is 135 East 57th Street, 9th Floor, New York City, New York.

**I. Matters to be Heard:**

**A. *Debtors' Emergency Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 3; Filed on 11/27/2024]**

i. Related Documents:

- a. *Declaration of Chris Caldwell in Support of First Day Motions* [Docket No. 11];
- b. *Request for Emergency Consideration of First Day Matters* [Docket No. 12];
- c. *Notice of First Day Hearings* [Docket No. 13]; and
- d. *Certificate of Service* [Docket No. 22].

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. At this time, no objections have been filed or asserted concerning the motion or the Court's entry of the proposed order as filed.

**B. *Notice of Designation as Complex Chapter 11 Bankruptcy Case* [Docket No. 4; Filed on 11/27/2024]**

i. Related Documents:

- a. *Declaration of Chris Caldwell in Support of First Day Motions* [Docket No. 11];
- b. *Request for Emergency Consideration of First Day Matters* [Docket No. 12];
- c. *Notice of First Day Hearings* [Docket No. 13];
- d. *Certificate of Service* [Docket No. 22]; and
- e. *Notice of Filing of Revised Proposed Order Granting Chapter 11 Complex Case Treatment* [Docket No. 26].

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The Debtors amended the original proposed order to incorporate omnibus hearing dates and filed a notice of revised proposed order. [See Docket No. 26].

**C. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Serve a Consolidated List of Creditors; (II) Authorizing the Debtors to Redact Certain Personal Identification Information; (III) Approving the Form and Manner of Notifying Creditors of the Commencement of the Debtors' Chapter 11 Cases and Bar Dates; and (IV) Granting Related Relief [Docket No. 5; Filed on 11/27/2024]***

i. Related Documents:

- a. *Declaration of Chris Caldwell in Support of First Day Motions [Docket No. 11];*
- b. *Request for Emergency Consideration of First Day Matters [Docket No. 12];*
- c. *Notice of First Day Hearings [Docket No. 13]; and*
- d. *Certificate of Service [Docket No. 22]; and*
- e. *Notice of Filing of Revised Proposed Order (I) Authorizing the Debtors to Serve a Consolidated List of Creditors, (II) Authorizing the Debtors to Redact Certain Personal Identification Information, (III) Approving the Form and Manner of Notifying Creditors of the Commencement of the Debtors' Chapter 11 Cases and Bar Dates, and (IV) Granting Related Relief [Docket No. 27].*

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The Debtors received informal comments from the United States Trustee regarding the original proposed order and addressed such comments via a revised proposed order. [See Docket No. 27].

**D. *Debtors' Emergency Application for Entry of Interim and Final Orders Authorizing the Employment and Retention of Stretto, Inc. as Claims, Noticing, and Solicitation Agent Effective as of the Petition Date [Docket No. 6; Filed on 11/27/2024]***

i. Related Documents:

- a. *Stretto Services Agreement [Docket No. 6-3];*
- b. *Declaration of Sheryl Betance in Support of Debtors' Emergency Application for Entry of Interim and Final Orders Authorizing the Employment and Retention of Stretto, Inc. as Claims, Noticing, and Solicitation Agent Effective of the Petition Date [Docket No. 6-4];*

- c. *Declaration of Chris Caldwell in Support of First Day Motions* [Docket No. 11];
  - d. *Request for Emergency Consideration of First Day Matters* [Docket No. 12];
  - e. *Notice of First Day Hearings* [Docket No. 13];
  - f. *Certificate of Service* [Docket No. 22]; and
  - g. *Notice of Filing of Revised Proposed Interim Order Authorizing the Employment and Retention of Stretto, Inc. as Claims, Noticing, and Solicitation Agent Effective as of the Petition Date* [Docket No. 28].
- ii. Response Deadline: Prior to the Hearing.
  - iii. Status: This matter will go forward. The Debtors received informal comments from the United States Trustee regarding the original proposed order and addressed such comments via a revised proposed order. [See Docket No. 28].

**E. *Debtors' Emergency Motion for Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs* [Docket No. 7; Filed on 11/27/2024]**

- i. Related Documents:
  - a. *Declaration of Chris Caldwell in Support of First Day Motions* [Docket No. 11];
  - b. *Request for Emergency Consideration of First Day Matters* [Docket No. 12];
  - c. *Notice of First Day Hearings* [Docket No. 13];
  - d. *Certificate of Service* [Docket No. 22]; and
  - e. *Notice of Filing of Revised Proposed Order Granting Emergency Motion for Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs* [Docket No. 25].
- ii. Response Deadline: Prior to the Hearing.
- iii. Status: This matter will go forward. The Debtors received informal comments from the United States Trustee regarding the original proposed order and addressed such comments via a revised proposed order. [See Docket No. 25].

**F. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses, (B) Continue Employee Benefits Programs, and (II) Granting Related Relief* [Docket No. 8; Filed on 11/29/2024]**

i. Related Documents:

- a. *Declaration of Chris Caldwell in Support of First Day Motions* [Docket No. 11];
- b. *Request for Emergency Consideration of First Day Matters* [Docket No. 12];
- c. *Notice of First Day Hearings* [Docket No. 13]; and
- d. *Certificate of Service* [Docket No. 22].

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. At this time, no objections have been filed or asserted concerning the motion or the Court's entry of the proposed order as filed.

**G. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to Continue to Operate Their Cash Management System and (II) Granting Related Relief* [Docket No. 9; Filed on 11/29/2024]**

i. Related Documents:

- a. *Declaration of Chris Caldwell in Support of First Day Motions* [Docket No. 11];
- b. *Request for Emergency Consideration of First Day Matters* [Docket No. 12];
- c. *Notice of First Day Hearings* [Docket No. 13]; and
- d. *Certificate of Service* [Docket No. 22]; and
- e. *Notice of Filing of Revised Proposed Order Granting Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to Continue to Operate Their Cash Management System and (II) Granting Related Relief* [Docket No. 29].

ii. Response Deadline: Prior to the Hearing.

- iii. Status: This matter will go forward. The Debtors received informal comments from the United States Trustee and Wells Fargo Bank NA

regarding the original proposed order and addressed such comments via a revised proposed order. [See Docket No. 29].

**H. *Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing and; (V) Granting Related Relief* [Docket No. 10; Filed on 11/29/2024]**

i. Related Documents:

- a. *Declaration of Chris Caldwell in Support of First Day Motions* [Docket No. 11];
- b. *Cash Collateral Budget* [Docket No. 21];
- c. *Request for Emergency Consideration of First Day Matters* [Docket No. 12];
- d. *Notice of First Day Hearings* [Docket No. 13]; and
- e. *Certificate of Service* [Docket No. 22].

ii. Response Deadline: Prior to the Hearing.

iii. Responses:

- a. *Demand for Adequate Protection, Limited Objection to Cash Collateral Motion and Reservation of Rights of Fifth Third Bank, National Association, as Senior Secured Lender* [Docket No. 24].

iv. Status: This matter will go forward.

**II. Witness and Exhibits Lists:**

**A. *Debtors' Amended Witness and Exhibit List on First Day Hearings* [Docket No. 23].**

[Signature Page to Follow]

DATED: December 2, 2024

Respectfully submitted by:

/s/ Holland N. O'Neil

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Stephen A. Jones (TX 24101270)

Mary Rofaeil (TX 24119467)

Zachary C. Zahn (TX 24137675)

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**PROPOSED COUNSEL TO DEBTORS  
AND DEBTORS IN POSSESSION**

**CERTIFICATE OF SERVICE**

I hereby certify that, on December 2, 2024, a true and correct copy of the foregoing document was served electronically by the Court's PACER system.

/s/ Stephen A. Jones

Stephen A. Jones